

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**KELLY A. TILLEY, as Personal
Representative of the Estate of
DANA ANDREW TILLEY, Deceased,**

Plaintiff,

VS.

Civil Action No.06-00513-KAJ

**PFIZER INC., PARKE-DAVIS, a division
of Warner-Lambert Company and
Warner-Lambert Company LLC,
WARNER-LAMBERT COMPANY and
WARNER-LAMBERT COMPANY LLC.**

Defendants.

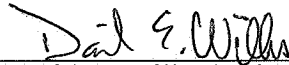
DEFENDANTS' MOTION TO STAY PROCEEDINGS PENDING MDL TRANSFER

Defendants Pfizer Inc. (“Pfizer”) and Warner-Lambert Company LLC (“Warner-Lambert”), successor to Warner-Lambert Company LLC, on its own behalf and on behalf of its unincorporated division, Parke-Davis, by their undersigned counsel, hereby move the Court pursuant to Rule 6(b) of the Federal Rules of Civil Procedure for an order staying all pretrial activity in this case, including, but not limited to, a ruling on any motion to remand (should one be filed), the period for initial disclosures pursuant to Rule 26 of the Federal Rules of Civil Procedure, and any other discovery and pretrial deadlines, pending transfer of this case to *In re Neurontin Marketing, Sales Practices and Products Liability Litigation*, MDL Docket No. 1629, for coordinated and consolidated pretrial proceedings. The reasons and authorities in support of this motion are set forth in the accompanying brief.

Pursuant to Local Rule 7.1.1, the undersigned certifies that he has made a reasonable effort to reach agreement with Plaintiffs' attorneys on the matters set forth in this motion.

Dated: August 31, 2006

Respectfully submitted,



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WARNER-LAMBERT COMPANY and
WARNER-LAMBERT COMPANY LLC,

Defendants.

Civil Action No. 06-CV-513

CERTIFICATE OF SERVICE

I, David E. Wilks, hereby certify that on the 31st day of August, 2006, I caused a true and correct copy of ***Defendants' Motion to Stay Proceedings Pending MDL Transfer*** to be served on the counsel for the plaintiff listed below, via electronic CM-ECF:

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Dated: August 31, 2006

/s/ David E. Wilks

David E. Wilks (DE ID 2793)